

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Pamela J. Stout James L. Stout <u>Debtor(s)</u>	CHAPTER 13
US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust <u>Movant</u>	NO. 22-22128 CMB
vs. Pamela J. Stout James L. Stout <u>Debtor(s)</u>	11 U.S.C. Section 362
Ronda J. Winnecour <u>Trustee</u>	

STIPULATION AND ORDER

AND NOW, come the undersigned parties, by and through their respective counsel, and enter into the following Stipulation:

WHEREAS, US Bank Trust National Association, not in its Individual Capacity but Solely as Owner Trustee for VRMTG Asset Trust, has filed a motion for relief from stay due to delinquent mortgage payments on the mortgage secured by Debtors' real property at 1533 West Crawford Avenue, Connellsville, PA 15425. (Doc. 51);

WHEREAS, Debtor has filed a response opposing relief from the automatic stay (Doc. 55)

WHEREAS, the parties enter into this Stipulation to resolve the motion for relief from the automatic stay.

It is therefore Stipulated and agreed as follows:

1. Debtors shall file an Amended Chapter 13 Plan on or before 2/19/2024, capitalizing the arrears to the trustee in the plan. (Doc. 19)

2. The automatic stay is terminated as it affects the interests of the Movant with respect to 1533 West Crawford Avenue, Connellsville, PA 15425 provided however, that relief from stay is stayed in accordance with the conditions set forth in Paragraphs 5-8, below.

3. On a go-forward basis from and after the date of the Order approving this Stipulation, the Debtors shall timely make full plan payments to the Chapter 13 Trustee, on or before the date upon which the respective plan payment is due.

4. Time is of the essence as to all plan payments going forward.

5. For the duration of this bankruptcy case, in the event that the Chapter 13 Trustee has not received a full plan payment by the last day of the month in which the Debtors' payment is due, as indicated by the Chapter 13 Trustee's online records, then the stay provided in Paragraph 2, above, shall be vacated and the automatic stay unconditionally lifted as it affects the interests of the Movant with respect to Debtor's real property at 11533 West Crawford Avenue, Connellsville, PA 15425, upon the filing of a Certification of Default by Movant, without further hearing or without entry of an additional order, if Debtors have failed to cure the default fifteen (15) days after written notice of default to Debtors' counsel.

6. Relief from the automatic stay shall be effective immediately upon conversion of Debtors' case to a case under Chapter 7.

7. In the event that the automatic stay is terminated as provided by this Order, then the Trustee shall make no further disbursements to Respondent on account

of its secured claim, unless directed otherwise by further Order of Court.

Consented to by:

/s/ Denise Carlon, Esquire

Denise Carlon, Esquire
PA ID No. 317226
KML Law Group, P.C.
Attorney for Movant
701 Market Street, Suite 5000
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/s/ Lawrence W. Willis Esquire

Lawrence W. Ellis, Esquire
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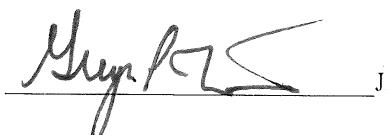
/s/ James C. Warmbrodt, Esquire

James C. Warmbrodt, Esquire for
Ronda Winnecour, Esquire
Office of Chapter 13 Trustee, WDPA
Attorney ID 42524
Suite 3250 , USX Tower
600 Grant Street
Pittsburgh, PA 15235
cmecl@chapter13trusteewdpa.com

On this 12th day of February, 2024, it is hereby ORDERED that
the parties' Stipulation be and hereby is APPROVED and the hearing in this matter
scheduled for 2/27/2024 at 1:30pm . is CANCELLED.

By the Court,

FILED
2/13/24 8:42 am
CLERK
U.S. BANKRUPTCY
COURT - WDPA

 J.

In re:
James L. Stout
Pamela J. Stout
Debtors

Case No. 22-22128-CMB
Chapter 13

District/off: 0315-2
Date Rcvd: Feb 13, 2024

User: auto
Form ID: pdf900

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Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Feb 15, 2024:

Recip ID **Recipient Name and Address**
db/jdb + James L. Stout, Pamela J. Stout, 1533 West Crawford Ave, Connellsville, PA 15425-2311

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Feb 15, 2024

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on February 13, 2024 at the address(es) listed below:

Name	Email Address
Andrew L. Spivack	on behalf of Creditor Portfolio Recovery Associates LLC, as assignee of Westlake Services, LLC ("PRA"), by and through it andrew.spivack@brockandscott.com, wbefc@brockandscott.com
Denise Carlon	on behalf of Creditor US Bank Trust National Association Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust dcarlon@kmllawgroup.com
Lawrence W. Willis	on behalf of Debtor James L. Stout ecf@westernpabankruptcy.com urfreshstr@gmail.com;willislr88866@notify.bestcase.com
Lawrence W. Willis	on behalf of Joint Debtor Pamela J. Stout ecf@westernpabankruptcy.com urfreshstr@gmail.com;willislr88866@notify.bestcase.com
Mario J. Hanyon	

District/off: 0315-2

User: auto

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Date Rcvd: Feb 13, 2024

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Total Noticed: 1

on behalf of Creditor Portfolio Recovery Associates LLC, as assignee of Westlake Services, LLC ("PRA"), by and through it
wbecf@brockandscott.com, mario.hanyon@brockandscott.com

Office of the United States Trustee

ustpregion03.pi.ecf@usdoj.gov

Ronda J. Winnecour

cmevf@chapter13trusteewdpa.com

TOTAL: 7